



**DICELLO LEVITT GUTZLER**

TEN NORTH DEARBORN STREET SIXTH FLOOR CHICAGO, ILLINOIS 60602

JAMES ULWICK  
JULWICK@DICELLOLEVITT.COM  
312.214.7900

November 21, 2023

**DELIVERY METHOD: ECF**

Hon. Lorna G. Schofield  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Huckabee v. Meta, et al.***  
**Case No. 1:23-cv-09152 (S.D.N.Y.)**  
**Letter Request for Extension of Deadline for Responses to**  
**Plaintiff's Complaint**

Dear Judge Schofield:

Pursuant to this Court's Individual Rules and Procedures for Civil Cases § I(b)(3), we write on behalf of Plaintiffs Mike Huckabee, Relevate Group, David Kinnaman, Tsh Oxenreider, Lysa Terkeurst, and John Blase, to request an extension of the deadlines for Defendants to respond to Plaintiff's Complaint to January 26, 2024.

Defendant Bloomberg Finance, L.P. was served on November 2, 2023. EleutherAI and Meta were both served on November 3, 2023. And Defendant Microsoft Corp. was served on November 13, 2023. Accordingly, the Defendants' deadlines to respond to Plaintiffs' Complaint are currently November 27, 2023 (Bloomberg, EleutherAI, Meta), and December 4, 2023 (Microsoft), respectively.

The Parties have discussed the intervening holidays, as well as the complexity of the case. Having conferred with Defendants, Plaintiffs propose that all Defendants be permitted until January 26, 2024, to file their responses to Plaintiffs' Complaint. This schedule will permit Defendants time to retain outside litigation counsel, and will require that all responses are filed on the same day, which will preserve judicial economy by ensuring uniform briefing schedules for any dispositive motions.

No prior requests have been made for adjournment or extension of time in this case. And Plaintiffs understand that all parties consent to the requested extension.

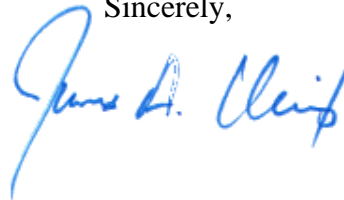
BIRMINGHAM • CHICAGO • CLEVELAND • NEW YORK • WASHINGTON DC

DICELLOLEVITT.COM

The requested extension will not affect any other scheduled dates, but Plaintiffs propose that the Court may wish to adjourn the Telephonic Initial Status Conference currently set for December 13, 2023, until after Defendants have entered their appearances and filed their responses to Plaintiffs' Complaint.

We thank the Court for its attention to this matter and are available should the Court have any questions.

Sincerely,

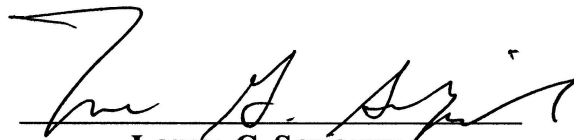


cc: All counsel of record.

James Ulwick

Application GRANTED. Defendants shall answer, move or otherwise respond to the Complaint by **January 26, 2024**. The initial pretrial conference will proceed as scheduled, and Defendants shall enter their appearances no later than **December 4, 2023**.

Dated: November 22, 2023  
New York, New York



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**